

6-17-91
12.3.8 v.5



FAXED
6/17

ASH GROVE CEMENT WEST, INC.

Inter-Office Memorandum

June 17, 1991

Date

To Steve Sheridan

From Ken Rone

Copies to Dan Peters

Subject PCB TRANSFORMERS

Re: your memo of June 13, 1991 on the above subject.

Response: We know of no liquid filled PCB transformers, oil switches or capacitors in excess of 1 PPM on our property.

Background: I feel we had in place an outstanding PCB compliance program which I would hold up to anyone's. Despite this, the following situations were unanticipated:

All PCB transformers and oil switches known to be in excess of 50 PPM were removed from the plant, leaving only non-PCB transformers and oil switches (as defined by the EPA) on the site. It came to our attention in 1990 that the State of Washington Dept. of Ecology considers only materials with <2 PPM as non PCB. Thus a renewed disposal program has just been completed.

Subsequent to the above discovery, while overhauling the Finish Mill 2500 HP motors, we discovered two starting capacitors which the manufacturer suspects are PCB. They are sealed and have no sampling ports. Replacements are on order and will be replaced when they arrive.

Lately, while preparing for the installation of the new plant substation, the neutral deriving transformer, which we thought was the property of Seattle City Light (and thus never checked) was discovered to contain >800 PPM and belonged to us. It has since been removed.

The lighting ballast in our old office building is suspected of containing PCB due to their age. I am not sure if such devices are exempt. Could you have Doug Hale research this.

The point of the above examples is that, while to the extent of our knowledge we have dealt with all the known liquid PCB situations, new ones keep cropping up. Your advice on how to achieve final conclusion on this issue would be helpful. Also, the extent of our exposures at our abandoned operations (Auburn and Dahl Island) remain unknown. The costs of PCB disposal and retrofit at the Seattle plant has been \$159,000.

USEPA SF



1261677

AGC2F000021